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17 Attorneys for Defendant  
18 BANK OF AMERICA, N.A.

19 **UNITED STATES DISTRICT COURT**

20 **DISTRICT OF NEVADA**

21 ALEXIS GURSHIN, an individual,

22 Plaintiff,

vs.

23 BANK OF AMERICA, NATIONAL  
24 ASSOCIATION; DOES 1 through X, and  
25 ROE BUSINESS ENTITIES I through X,  
26 inclusive,

27 Defendants.

28 CASE NO. 2:15-cv-00323-GMN-VCF

**JOINT STIPULATION TO EXTEND  
DEFENDANT'S RESPONSIVE MOTION  
DEADLINES COMMENSURATE WITH  
THE EXTENSIONS GRANTED TO  
PLAINTIFF IN DKT. #115**

1 **Additional Plaintiff's Counsel**

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1 The parties, Plaintiff Alexis Gurshin (“Plaintiff”) and Defendant Bank of America, N.A.  
2 (“Defendant” or “BANA”) (collectively, the “Parties”), through their respective attorneys of  
3 record, hereby stipulate as follows:

## RECITALS

5       1. On November 7, 2016, Plaintiff filed a Joint Stipulation to Extend 11/8/16 Filing  
6 Deadline For Filing RFA-Related Deadlines As Ordered in ECF No. 108 and 113, For Two Days  
7 (Dkt. #114), which requested that the Court extend Plaintiff's deadline to file her response in  
8 opposition to Defendant's Motion for Order Deeming Defendant's Second Set of Requests For  
9 Admissions to Plaintiff, Or Alternatively, Compelling Responses (Dkt. #106) and her deadline to  
10 file a motion to compel Defendant's responses to Plaintiff's Requests for Admission, from  
11 11/8/2016 to 11/10/2016 due to a scheduling conflict of Plaintiff's counsel. On November 8,  
12 2016, this Court granted the request. *See* Dkt. #115.

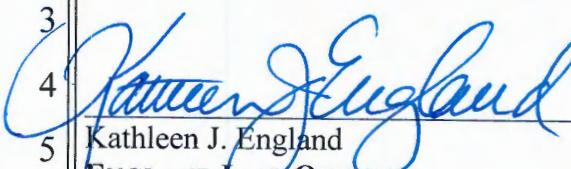
13        2.        The Parties inadvertently neglected to request a commensurate extension of  
14 Defendant's related deadlines – namely, Defendant's 11/15/16 deadline to file a reply in support  
15 of its Motion (Dkt. #106), and Defendant's 11/15/16 deadline to oppose the anticipated motion of  
16 Plaintiff to compel Defendant's responses to Plaintiff's Requests for Admission – deadlines which  
17 were previously set by the Court in Dkts. #108 and 113, respectively. A commensurate extension  
18 is necessary to afford Defendant a fair opportunity to respond to Plaintiff's anticipated filings, as  
19 originally contemplated.

## **STIPULATION**

21       3. NOW, THEREFORE, based on the foregoing, the Parties stipulate to request this  
22 Court for a commensurate two-day extension (to November 17, 2016) for Defendant to file a reply  
23 in support of its Motion (Dkt. #106) and to oppose any motion by Plaintiff to compel Defendant's  
24 responses to Plaintiff's Requests for Admission.

1 IT IS SO STIPULATED.

2 Dated: November 10, 2016

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11 Attorneys for Plaintiff ALEXIS GURSHIN  
12

Dated: November 10, 2016

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13 Attorneys for Defendant BANK OF  
14 AMERICA, N.A.

15 IT IS SO ORDERED:  
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17 11-14-2016  
18 DATED: \_\_\_\_\_

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UNITED STATES MAGISTRATE JUDGE  


1 **IT IS SO STIPULATED.**

2 Dated: November 14, 2016

Dated: November 14, 2016

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11 Attorneys for Plaintiff ALEXIS GURSHIN

12 Attorneys for Defendant BANK OF  
13 AMERICA, N.A.

14  
15 **IT IS SO ORDERED:**

16  
17 DATED: \_\_\_\_\_

18 UNITED STATES MAGISTRATE JUDGE

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